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IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA

W. A. DREW EDMONDSON, in his)
capacity as ATTORNEY GENERAL)
OF THE STATE OF OKLAHOMA and)
OKLAHOMA SECRETARY OF THE)
ENVIRONMENT C. MILES TOLBERT,)
in his capacity as the)
TRUSTEE FOR NATURAL RESOURCES)
FOR THE STATE OF OKLAHOMA,)

Plaintiff,)

vs.) 4:05-CV-00329-TCK-SAJ

TYSON FOODS, INC., et al,)

Defendants.)

- - - - -

VOLUME I OF THE VIDEOTAPED
30(b)(6) DEPOSITION OF TEENA GUNTER, produced
as a witness on behalf of the Defendants in the
above styled and numbered cause, taken on the 27th
day of August, 2008, in the City of Oklahoma City,
County of Oklahoma, State of Oklahoma, before me,
Lisa A. Steinmeyer, a Certified Shorthand Reporter,
duly certified under and by virtue of the laws of
the State of Oklahoma.

1 TEENA GUNTER
2 having first been duly sworn to testify the truth,
3 the whole truth and nothing but the truth, testified
4 as follows:

5 DIRECT EXAMINATION

6 BY MR. HIXON:

7 Q Can you state your name for the Record,
8 please?

9 A It's Teena Gale Gunter.

10 Q And, Miss Gunter, what's your current 09:20AM
11 position?

12 A I'm a deputy general counsel at the Oklahoma
13 Department of Agriculture, Food & Forestry.

14 Q How long have you been in that position?

15 A In that position, approximately probably four 09:20AM
16 years.

17 Q Okay, and prior to that position, what
18 position did you hold?

19 A I was a staff attorney with the Oklahoma
20 Department of Agriculture, Food & Forestry in the 09:21AM
21 agricultural environmental management services
22 division.

23 Q Okay, and how long did you hold that position?

24 A I don't remember exactly when I switched to
25 that position. I held another position before that, 09:21AM

1 litter application rates for use in the TMDL?

2 **A** Assumptions?

3 **Q** Or data.

4 **A** We provided our litter applicator reports that
5 we had at that time.

11:39AM

6 **Q** Okay. What information would be contained in
7 the litter applicator reports?

8 **A** Each applicator provides a report annually
9 that contains where they got the litter from and
10 where they spread it, soil test analysis, poultry
11 litter analysis, other details of the specific
12 application event.

11:39AM

13 **Q** And do you know when that information was
14 provided to DEQ?

15 **A** I don't recall.

11:39AM

16 **Q** When was the litter or -- yeah, the Litter
17 Applicator Act enacted?

18 **A** July 1st, 1997.

19 **Q** So it would have been at least since July 1st,
20 1997 that that information was provided to DEQ?

11:40AM

21 **A** Would have been after that.

22 **Q** Okay. Do you know if that was just a one-time
23 production to DEQ or whether that's been an ongoing
24 process?

25 **A** I know I was involved in it one time.

11:40AM